

LAW OFFICE OF  
ZACHARY MARGULIS-OHNUMA

September 2, 2015

**Via ECF and email**

AUSA Karen Koniuszy  
United States Attorney's Office  
271 Cadman Plaza East  
Brooklyn, NY 11201

RE: U.S. v. Adamou Djibo, 15-CR-88 (SJ)

Dear Ms. Koniuszy:

This office represents the defendant Adamou Djibo in the above-captioned case. In advance of tomorrow's suppression hearing, I hereby request that the government produce any and all documentation that Agent Bauer reviewed or has in his possession regarding the IP Box device. This production should include all articles, advertisements, government policies, websites, brochures, emails or other materials regarding the functioning or capabilities of the IP Box device. Please provide this by close of business today to avoid further delays in the hearing.

This request is a reiteration of the original request made via email on July 6, 2015 and via ECF on July 22, 2015 for a written summary of any testimony that the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, including a description of the "bases and reasons for" the opinions offered. Pursuant to Rule 702, such report should disclose "the expert's scientific, technical, or other specialized knowledge will help the

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trier of fact to understand the evidence or to determine a fact in issue," the "sufficient facts or data" supporting the expert's opinion, and how "the testimony is the product of reliable principles and methods; and the expert has reliably applied the principles and methods to the facts of the case."

Thank you for your attention to this case.

Very truly yours,

*Zachary Margulis-Ohnuma*

Zachary Margulis-Ohnuma

CC: Clerk of Court (via ECF)